

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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IN RE BAYOU HEDGE FUND INVESTMENT	:	MDL No. 1755 (CM)
LITIGATION	:	
	:	
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THIS DOCUMENT RELATES TO:		
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	:	
BROAD-BUSSEL FAMILY LIMITED	:	No. 06 Civ. 3026 (CM)
PARTNERSHIP, MARIE LOUISE,	:	
MICHELSON, MICHELLE MICHELSON, and	:	DECLARATION OF JOHN K. VAN
HERBERT BLAINE LAWSON, JR., Individually	:	<u>DE WEERT</u>
and on Behalf of All Other Persons and Entities	:	
Similarly Situated,	:	
	:	ELECTRONICALLY FILED
Plaintiffs,	:	
	:	
- against -	:	
	:	
BAYOU GROUP LLC, et al.,	:	
	:	
Defendants.	:	
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JOHN K. VAN DE WEERT, pursuant to 28 U.S.C. § 1746, declares and states as follows:

1. I am an attorney admitted to the Bars of the State of Illinois and of the District of Columbia, and I have have been admitted to practice before this Court *pro hac vice*. I am associated with the law firm Sidley Austin LLP, counsel for defendant Citibank, N.A. ("Citibank"). I am familiar with the facts and circumstances set forth below, and I submit this Declaration in support of the Citibank's Rule 12(b)(6) Motion to Dismiss.

2. Attached as Exhibit 1 is a true and correct copy of the Amended Class Action Complaint filed by plaintiffs in the District of Connecticut on March 6, 2006, in case

number 3:05-cv-1762-JBA (D. Conn.). That matter was subsequently transferred to this Court by the Judicial Panel on Multidistrict Litigation, and is now pending before this Court as case number 06 Civ. 3026 (CM) (S.D.N.Y.).

3. I declare under penalty of perjury that the foregoing is true and correct.

Executed on May 31, 2006 at Washington, D.C.

s/ John K. Van De Weert

John K. Van De Weert

CERTIFICATE OF SERVICE

I hereby certify that on May 31, 2006, a copy of the Declaration of John K. Van De Weert was filed electronically and served by U.S. mail, first class postage prepaid, on anyone unable to accept electronic filing. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF System.

s/ John K. Van De Weert
John K. Van De Weert